

The Commission has also requested comments regarding whether the eligibility of participants in the programs should be verified and, if so, what measures should be used. We note that verification requirements for Lifeline/Link-up programs vary widely from state-to-state. Some states, such as Oklahoma, have a self-certification program wherein the consumer certifies that he or she is eligible for the programs, but is not required to

produce any evidence of eligibility. Other states, such as Kansas, require that participants present evidence that they are in one of the social programs that qualifies them for Lifeline/Link-up assistance. While verification requirements might prevent fraudulent abuse of the programs, significant occurrences of such abuse have not come to the attention of our clients. We do not believe that it is appropriate for carriers, who typically are not in the position of administering social services programs, to be in a position of verifying the eligibility of participants in these programs. Currently, there is no direct reimbursement to carriers for their administrative costs relating to Lifeline/Link-up programs. Should significant additional Lifeline/Link-up responsibilities be placed upon carriers, the Commission should consider appropriate ways to accurately recognize these administrative costs both jurisdictionally and in terms of reimbursement.

Should you require more specific information or wish to discuss these comments further, please contact our Tulsa office at 918-496-1444 or our Colorado Springs office at 719-531-6342.